

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:14-CR-151-Y

JESUS GERARDO LEDEZMA-CEPEDA (01)
JOSE LUIS CEPEDA-CORTES (03)

GOVERNMENT'S NOTICE OF INTENT TO OFFER
EVIDENCE PURSUANT TO RULE 902(11) FED.R.EVID.

The United States of America hereby notifies the defendants of its intention to offer evidence pursuant to Rule 902(11) during its case-in-chief. Rule 902(11) provides in pertinent part:

The original or duplicate of a domestic record of regularly conduct activity that would be admissible under Rule 803(6) if accompanied by a written declaration of its custodian or other qualified person . . . certifying that the record

- (A) was made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;
- (B) was kept in the course of the regularly conducted activity; and
- (C) was made by the regularly conducted activity as a regular practice.

A party intending to offer a record into evidence under this paragraph must provide written notice of that intention to all adverse parties, and must make the record and declaration available for inspection sufficiently in advance of their offer into evidence to provide an adverse party with a fair opportunity to challenge them.

Fed.R.Evid. 902(11).

The exhibits which the government intends to offer at the beginning of its case-in-chief include the following:

SELF-AUTHENTICATING EXHIBITS	DESCRIPTION
1.	Border Crossing Records of Ledezma-Cepeda, Ledezma-Campano, Jose Luis Cepeda-Cortes, Laura Lynette Cepeda and Miriam Cepeda
2.	Subscriber Information Return on XXXXX10
3.	Search Warrant Return of Email Records for XXXXX10 and XXXXXX56
4.	Administrative Subpoena Return for XXXXX56 Email Records
5.	Verizon Wireless Records of Cepeda-Cortes Wifi Device: XXX-XXX-0364
6.	Search Warrant Return for XXXXX10 and XXXXXXXXpro
7.	Data from Google on gmail addresses XXXX9, XXXX12 and XXX@gmail.com
8.	Federal Search Warrant Return For XXXXXXXXpro
14.	Sprint Phone Records and cell site information for XXX.XXX.4204, XXX.XXX.9785, and XXX.XXX.7272
16.	American Airlines Travel Records for Ledezma-Cepeda, Ledezma-Campano and Cepeda-Cortes
17.	Blackline GPS Tracker Records
20.	Cricket Phone Records XXX.XXX.3268
24.	Phone Records for XXX.XXX.1720

25.	Financial Services Records Western Union
26.	Bill Me Later Records, 12/27/12
29.	Chase Bank Records of Cepeda-Cortes, #9025
32.	Motel 6 Receipt, McAllen, TX 12/18/12
33.	Phone Records of XXX.XXX.7204
34.	United Airlines Travel Records
35.	Chase Credit Card Records, #4955
36.	AT&T Record of IP Address for Cepeda-Cortes U-Verse account
42.	Email Records for XXX@hotmail.com
43.	Wells Fargo Visa Bill, #5273, 2/20/13
46.	Gmail Account of xxx@gmail.com
47.	Sprint Records for XXX.XXX.3601/3602
48.	Email Records for XXX gmail.com and XXXXXXXpro
52.	Super 8 Receipt, 3/6/13 – 3/10/13, 3/15/13 – 3/17/13, 4/19/13 – 4/21/13
53.	Enterprise Rental Records
58.	Outdoor Spy Game Camera Receipts
61.	Verizon IP Records for XXX.XXX.0364
62.	TAD Records Search, Montecito Address
65.	Sprint Records, XXX.XXX.3268
66.	BBVA Records and Deposit of \$8,000.00
68.	Southwest Airlines Flight Records
75.	Motel 6 Records for Ismael Ramirez

83.	Mid Cities Inn Receipt, 5/2/13
86.	Videos from Wal-Mart, 5/29/13 and 5/20/13
87.	Hotmail Records for XXX@hotmail.com
89.	AT&T Phone Records, XXX.XXX.7473, XXX.XXX.7641
90.	Blackberry Records, XXX.XXX.9785, XXX.XXX.4204
91.	Video from Southlake Schools, 5/22/13
92.	Surveillance Video from Southlake Town Square
93.	Map of Southlake Town Square
99.	Photo of Ledezma-Cepeda and Ledezma-Campano at 7-11, 5/22/13
121.	Autopsy Report Cantu-Lozano and Cantu-Cuellar
151.	Time Warner IP Address Records for Microtel, Euless, Texas
154.	Texas Murder Statute, Texas Penal Code, Title 5
155.	XXX@hotmail.com, Subscriber Information
156.	IP Logs for XXX@hotmail.com
359.	Google subscriber information for XXX@gmail.com
360.	Renter's Agreement for XXXX North East Street, Rio Grande City
361.	Renter's Agreement for XXXX North East Street, Rio Grande City
416.	Redfin Records
486.	Blackberry Certification of Records for USCR-130506-030
487.	Blackberry Certification of Records for USCR-130627-014

488.	Blackberry Certification of Records for USCR-130725-004 (10/7/13)
489.	Blackberry Certification of Records for USCR-130725-004 (4/14/14)
490.	Blackberry Certification of Records for USCR-140818-013 (08/18/14)
491.	Blackberry Certification of Records for USCR-140818-013 (9/15/14)
493.	AT&T U-verse internet account for Cepeda Body Shop at XXXX Business 83.

The above described exhibits have been either previously provided to the defendant or are currently available for inspection and copying at the offices at the United States Attorney's Office. Each of these documents have an accompanying affidavit complying with requirements of Rule 902(11).

Respectfully submitted,

JOHN R. PARKER
UNITED STATES ATTORNEY

s/ Joshua T. Burgess
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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2016, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who has consented in writing to accept this Notice as service of this document by electronic means.

s/ Joshua T. Burgess

JOSHUA T. BURGESS

Assistant United States Attorney